

**Financial Management Service**  
**Privacy Impact Assessment Template**  
**RO Payments**

**Name of Project: ASAP**  
**Project's Unique ID: ASAP**

**A. SYSTEM APPLICATION/GENERAL INFORMATION:**

**1) Does this system contain any information about individuals?**

Yes. The information is about individual members of the public, but not employees.

**a. Is this information identifiable to the individual<sup>1</sup>?**

(If there is **NO** information collected, maintained, or used that is identifiable to the individual in the system, the remainder of the Privacy Impact Assessment does not have to be completed).

Information in ASAP consists of Employee Identification Number, Social Security Number, Name Address, Phone Number and Bank Account Information.

**b. Is the information about individual members of the public?**

(If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation).

ASAP contains information about individual members of the public.

**c. Is the information about employees?** (If yes and there is no information about members of the public, the PIA is required for the FMS IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).

ASAP does not contain information about employees.

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<sup>1</sup> "Identifiable Form" - According to the OMB Memo M-03-22, this means information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

**2) What is the purpose of the system/application?**

ASAP is an Internet payment mechanism that assists Federal agencies in disbursing monies to states, municipalities, nonprofit entities, universities and individuals.

**3) What legal authority authorizes the purchase or development of this system/application?**

By statute, Treasury has the authority to disbursement public funds for executive branch agencies. 31 USC 3321. Also, Treasury disbursing officials may only disburse funds in accordance with a payment certification voucher received from a paying agency. 31 USC 3325. ASAP is a disbursement program, which is authorized under these two statutes.

**C. DATA in the SYSTEM:**

**1) What categories of individuals are covered in the system?**

The individuals covered are Federal Grant recipients and Program agencies.

**2) What are the sources of the information in the system?**

**a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?**

The information is provided by the Recipient Organization and maintained by the individual..

**What Federal agencies are providing data for use in the system?** For the listing of Federal agencies, please contact the FMS FOIA representative at 202-874-6837.

**b. What State and local agencies are providing data for use in the system?**

For the listing of State agencies, please contact the FMS FOIA representative at 202-874-6837.

**c. From what other third party sources will data be collected?**

NA

**d. What information will be collected from the employee and the public?**

Name, address, phone number, and email address.

### **3) Accuracy, Timeliness, and Reliability**

#### **a. How will data collected from sources other than FMS records be verified for accuracy?**

Data collected from sources other FMS is verified for accuracy by the entity which owns the data.

#### **b. How will data be checked for completeness?**

ASAP has required fields with edits to ensure completeness of data to the minimum standards specified in requirements documents.

#### **c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).**

ASAP.gov users are provided a means to keep their information current through the application on-line screens, i.e. Modify My Information. It is the sole responsibility of the individual user to maintain his own information, and it is the responsibility of the Authorizing Official to keep the list of users and roles for their organization up to date. Additionally, User IDs are rendered inactive after 90 days of non-use, requiring system administrator assistance to re-activate with current information.

#### **d. Are the data elements described in detail and documented? If yes, what is the name of the document?**

The data elements are described in detail in the requirements documents for each module of the application.

### **D. ATTRIBUTES OF THE DATA:**

#### **1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

Yes, the data is relevant and necessary to the purpose for which the system is being designed.

#### **2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

ASAP will not derive new data or create previously unavailable data about an individual through aggregation from the collected information.

**3) Will the new data be placed in the individual's record?**

NA

**4) Can the system make determinations about employees/public that would not be possible without the new data?**

NA

**5) How will the new data be verified for relevance and accuracy?**

NA

**6) If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

ASAP implements and maintains significant and comprehensive security features to ensure that risks, threats and vulnerabilities are minimized. These are outlined in our System Security Plan

**7) If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.**

NA

**8) How will the data be retrieved?** Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.

Yes, Users must enter a password and ID access their own data in the application To view users assigned to their organization if their role allows access.

**9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

A report that allows users to view their own data and data that they have least privilege role based access to. The reports will be used to verify enrollment information and will be used by Recipient Organizations, Federal Program agencies, Regional Financial Center and Federal Reserve Bank users.

**10) What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.)**

ASAP has required and non required fields and individuals may decline to provide any non required information.

**E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:**

**1) If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

All data collected in one site is written to the other. Refer to the ASAP Contingency Plan for maintenance and disaster recovery information.

**2) What are the retention periods of data in this system?**

Individual information in the system is retained indefinitely, including user accounts that have been suspended. "Old" information that has been updated by an authorized user is not retained. All transactional data is maintained permanently in ASAP.

**3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

As of November 1999, all ASAP reports have been assigned a retention period of 99 years. This documented in the FRB/FMS SLA

**4) Is the system using technologies in ways that the FMS has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

ASAP is not currently using any technology that FMS has not previously employed.

**5) How does the use of this technology affect public/employee privacy?**

NA

**6) Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

No

**7) What kinds of information are collected as a function of the monitoring of individuals?**

ASAP does not collect data to monitor individuals.

**8) What controls will be used to prevent unauthorized monitoring?**

NA

**9) Under which Privacy Act systems of records notice does the system operate? Provide number and name.**

Payment Records for Other Than Regular Recurring Benefit Payments – Treasury/FMS .016 which is subject to the Privacy Act of 1974 as amended (5 U.S.C. 552a)

**10) If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.**

No amendment or revision is necessary.

**F. ACCESS TO DATA:**

**1) Who will have access to the data in the system? (E.g., contractors, users, managers, system administrators, developers, other)**

Users, Managers System Administrators Developers and Contractors will have access to data in the system.

**2) How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?**

Access to data by user is determined by the roles requested when access to the system is granted.

**3) Will users have access to all data on the system or will the user's access be restricted? Explain.**

User access will be restricted to their own data once being identified by user name and password. The user will also be restricted through least privileges by role based access.

- 4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials)**

User access will be restricted to their own data once being identified by user name and password. The user will also be restricted through least privileges by role based access.

- 5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?**

Yes, contractors are involved with the design and development of the system and are involved with its maintenance. Vendor contracts contain clauses which address requirements for handling confidential information, and individual contractors are required to sign an Information Security Responsibility Agreement which also includes guidelines for maintaining confidentiality of information.

- 6) Do other systems share data or have access to the data in the system? If yes, explain.**

Yes, Interfaces with Federal agencies provide detailed payment data. Other systems interface with ASAP for the purpose of making payments. For disbursements, only the necessary information to create an electronic payment is sent to the Automated Clearing House (ACH) system: Bank Routing Number, Bank Account Number, Bank Account Title and dollar amount. Other interfaces are for Federal agency accounting and do not involve individual data.

- 7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface? Not Applicable**

- 8) Will other agencies share data or have access to the data in this system (Federal, State, Local, Other)?**

Federal Agencies, who use ASAP to make payments to the public, have access to their Recipient's data. All other non-Federal agency users only have access to their own data.

- 9) How will the data be used by the other agency?**

Federal agencies use the data in ASAP to ensure that they are disbursing funds to the correct Recipient.

**10) Who is responsible for assuring proper use of the data?**

The Federal agencies assume responsibility for the data once it is accessed by them.